

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Richmond Division

UNITED STATES OF AMERICA)	Criminal No. 3:21-cr-132-JAG
)	
v.)	
)	
CARL ANTHONY MCNEILL,)	
)	
and)	
)	
KYSNTOILIOUS MILLER,)	
)	
Defendants.)	

Motion for Entry of Protective Order

The United States of America, by undersigned counsel, respectfully moves for entry of a protective order regarding disclosure of information produced by the parties to each other in this case pursuant to Federal Rule of Criminal Procedure 16(d)(1). In support thereof, the government states as follows:

1. The production of certain potentially discoverable information in this case may lead to the disclosure of sensitive information associated with various non-parties to this case, particularly home addresses, personal identifying information, and banking information that is protected from disclosure under applicable law, including Federal Rule of Criminal Procedure 49.1. Given the volume of documents in this matter, it would be impracticable to redact items of personal identifying information and timely comply with discovery requirements. The proposed Protective Order regulates the discovery of such information by restricting its use and dissemination.

2. In the interest of expediting the discovery process, the government proposes that the Court enter the attached Protective Order, which contains language allowing the parties to modify the order by motion if they deem it necessary.

3. The government has not had yet consulted with the defendants' respective counsel on this motion. It will promptly attempt to obtain their agreement to this motion as well as their signatures on the attached order. After obtaining defense counsels' signatures, the government will present the Order to the Court for entry.

Wherefore, the undersigned respectfully requests that the Court enter the proposed Protective Order after endorsement by all parties.

Respectfully submitted,

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